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PLEASE REPLY TO
ATLANTIC COUNTY OFFICE

November 20, 2018

The Honorable Magistrate Judge Ann Marie Donio
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets, Court Room: 3B
Camden, NJ 08101

Re: The Estate of Joey Myers and Carolyn K. Chaudry, as
Administrator Ad Prosequendum of the Estate of Joey Myers,
and in her own right v. The City of Millville, Chief Jody
Farabella, individually and his official capacity, Officer
Michael Calchi, Officer Gavin Phillips, Officer Jeffrey
Proffit, and John Doe Police Officers 1-10, individually and
in their official capacities
Docket Number: 17-cv-01411 JHR/AMD

Dear Magistrate Judge Donio:

On or about September 27, 2018, a scheduling order was entered
in this case with pretrial factual discovery to be concluded by
November 30, 2018. We are asking that the deadline for fact
discovery be extended thirty (30) days.

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November 20, 2018

The Honorable Magistrate Judge Ann Marie Donio

Re: The Estate of Joey Myers and Carolyn K. Chaudry, as Administrator Ad Prosequendum of the Estate of Joey Myers, and in her own right v. The City of Millville, Chief Jody Farabella, individually and his official capacity, Officer Michael Calchi, Officer Gavin Phillips, Officer Jeffrey Proffit, and John Doe Police Officers 1-10, individually and in their official capacities
Docket Number: 17-cv-01411 JHR/AMD

The date that Chief Farabella is available for deposition is on December 17, 2018, which is after the day that fact discovery was to be completed.

We have consent from Plaintiff's counsel Hillary Nappi.

Respectfully submitted

BARKER, GELFAND, JAMES & SARVAS
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